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Request for Participation #3

U.S.D.A., NAL
SEP 16 2000
Cataloging Prep

Environmental Impact Statement for a Program of Vegetation Management

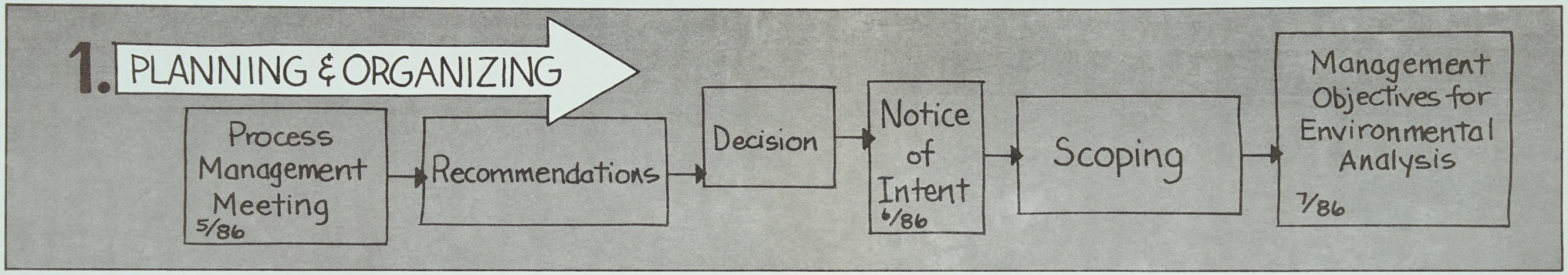
A *New Program* for managing competing and unwanted vegetation is being developed by the Pacific Northwest Region (Oregon and Washington) of the USDA Forest Service. This **Request For Participation** is the **third** in a series of requests for your help in the development of the environmental impact statement (EIS) for the new program. The purpose of this third request is to provide you an opportunity to review and comment on:

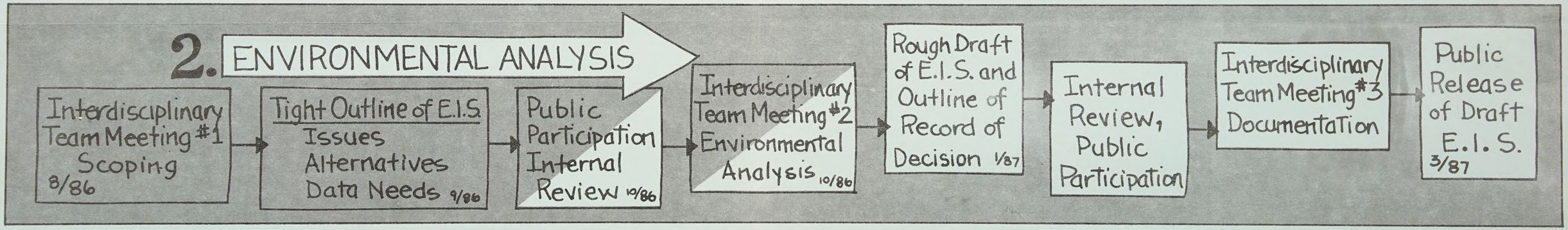
- how we are responding to issues;
- the alternatives we have formed, and;
- the environmental analysis we are conducting.

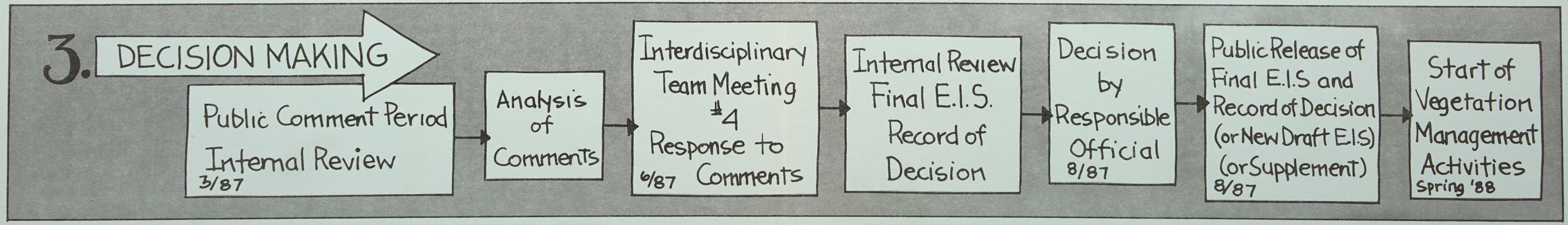
A Response Guide has been enclosed for your comments.

SHOUT
SHARE
IT

Pacific Northwest Region
Vegetation Management
Environmental Impact Statement
The Process




2. ENVIRONMENTAL ANALYSIS
Interdisciplinary Team Meeting #1 Scoping 8/86
Tight Outline of E.I.S. Issues Alternatives Data Needs 9/86
Public Participation Internal Review 10/86
Interdisciplinary Team Meeting #2 Environmental Analysis 10/86
Rough Draft of E.I.S. and Outline of Record of Decision 1/87
Internal Review, Public Participation
Interdisciplinary Team Meeting #3 Documentation
Public Release of Draft E.I.S. 3/87


3. DECISION MAKING
Public Comment Period Internal Review 3/87
Analysis of Comments
Interdisciplinary Team Meeting #4 Response to Comments 6/87
Internal Review Final E.I.S. Record of Decision
Decision by Responsible Official 8/87
Public Release of Final E.I.S and Record of Decision (or New Draft E.I.S) (or Supplement) 8/87
Start of Vegetation Management Activities Spring '88

USDA Forest Service
Pacific Northwest Region
P.O. Box 3623
Portland, OR 97208
Attn: Vegetation Management Team

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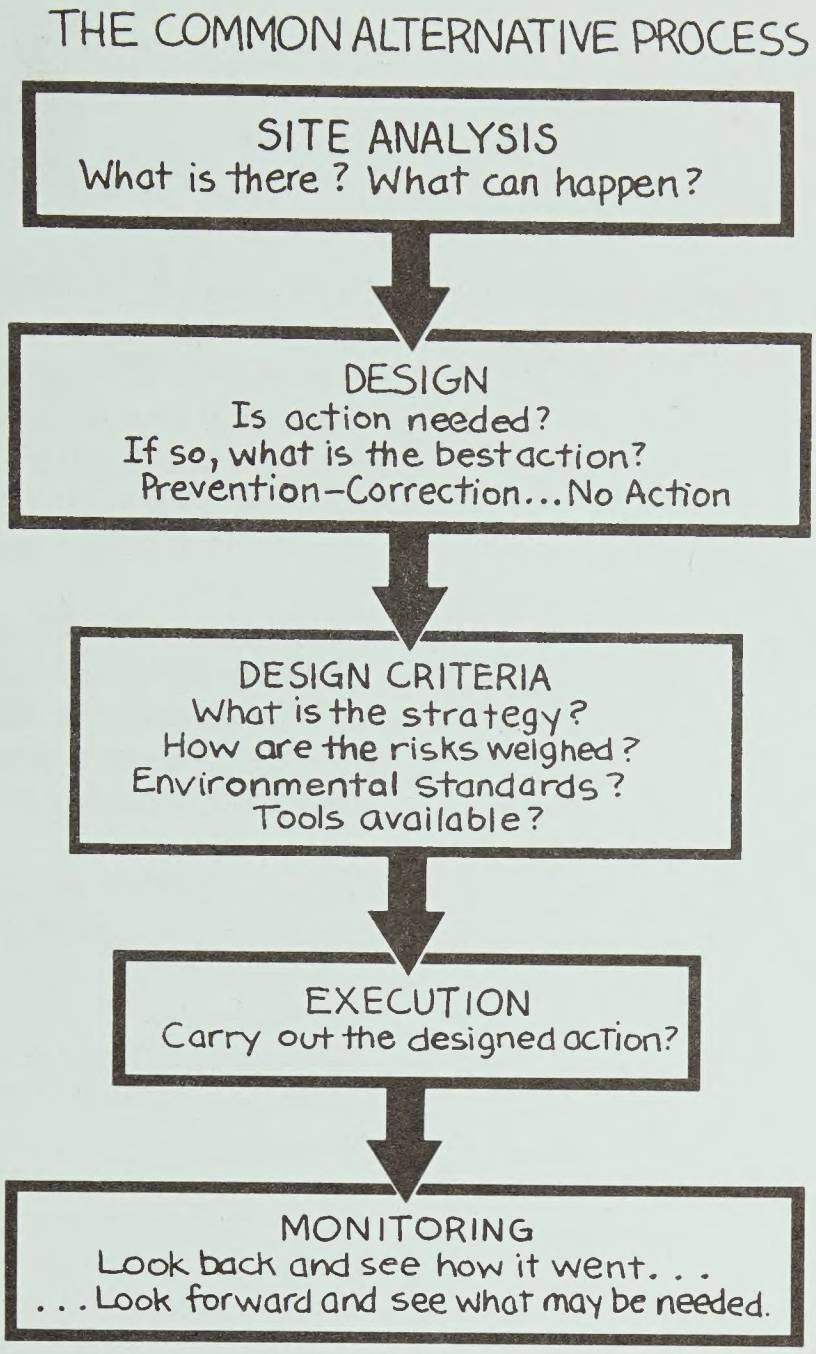

THE COMMON ALTERNATIVE PROCESS
SITE ANALYSIS
What is there ? What can happen?
DESIGN
Is action needed?
If so, what is the best action?
Prevention–Correction...No Action
DESIGN CRITERIA
What is the strategy?
How are the risks weighed?
Environmental standards?
Tools available?
EXECUTION
Carry out the designed action?
MONITORING
Look back and see how it went. . .
. . . Look forward and see what may be needed.

ALTERNATIVES

In our previous "Request for Participation," we shared seven broad alternative themes. Some of you had concerns: "[the alternatives did not] stand as a complete program that people could identify with"; "an alternative is not viable if it is responsive to only one public issue"; and, "...it appears to us that your array of alternatives combines several elements...alternatives and selection criteria."

With the comments in hand, the team gathered more information and spent three solid weeks discussing, writing, reviewing and editing the alternatives, significantly changing them. We want to take this opportunity to share them with you, and get your thoughts.

These alternatives are different than those you have seen in most environmental impact statements. They present a common decision-making process. This process is one a field manager or specialist would follow in making specific decisions about how to manage vegetation on a particular site.

The process is essentially the same in each alternative: it is one of scientific management. Within the process, the alternatives differ by management philosophy; different levels of acceptable damage and risk; and tools and techniques available.

ALTERNATIVE DESCRIPTIONS

All alternatives look to the future and are connected to Forest plans now being developed for National Forests in Oregon and Washington. In several alternatives, the budget, costs, and/or goods and services vary in specific ways. These alternatives for Vegetation Management are for activities in the following areas:

- plantation site preparation
- recreation facilities maintenance
- fuels treatment
- conifer release
- range improvement
- facilities maintenance
- tree genetic activities
- noxious weed control
- research
- wildlife habitat improvement
- rights-of-way maintenance (roads, utilities, & railroads)

With **ALTERNATIVE A,** we would intensively manage resources, meet program goals and, within this framework, minimize effects on the environment. "A" describes the vegetation management program assumed in the Forest plans now being produced, **except** that herbicides may not be used.

Using **ALTERNATIVE B,** we would operate under a resource philosophy similar to Alternative A, including the assumption of management according to Forest plans. In this alternative, **all tools are available.**

Under **ALTERNATIVE C,** our management would be based on a philosophy of "no-action unless **public safety is clearly threatened**." For example, hazardous trees would be removed in campgrounds and brush would be removed from roadsides to maintain safe visibility. There will be no vegetation management related to production of forest goods and services. If action is necessary, **neither chemical herbicides nor fire will be used.**

In **ALTERNATIVE D,** we would emphasize and integrate natural ecosystem processes into all management strategies and practices. Goods and services for human use would be produced within this framework. **Prevention** is the preferred strategy, with an emphasis on **monitoring** and **evaluation.** All tools are available, with chemical methods used only **as a last resort.**

With **ALTERNATIVE E,** our object would be to produce resources for human use, while emphasizing protection of human health and safety. "E" stresses minimum effects on the environment. **Prevention** is the preferred strategy, except where **correction** would result in lower costs or environmental impacts. Use of specific herbicides and power tools will be **restricted,** based on the findings of the human health risk assessment conducted as part of the EIS.

Under **ALTERNATIVE F,** we would intensively manage resources, meet program goals and, within this framework, minimize effects on the environment. "F" describes the vegetation management program assumed in Forest plans, except methods **other than burning** would be emphasized. Burning of chemically treated slash will be **prohibited.** Burning of logging slash will be allowed only for protection purposes and only if no other vegetation management tool will achieve the same results.

With **ALTERNATIVE G,** we would intensively manage resources, **maximize** the production of resources for human use, and, within this framework, minimize effects on the environment. Forests would be managed under Forest plans now being developed. As a way to increase the production of resources for human use, **vegetation will be managed aggressively,** using any cost-effective tool or technique.

ISSUES

ISSUES

In determining the course of action that is in the best interest of people and our natural resources, we are committed to giving full consideration to the public's thoughts and ideas. There are, of course, conflicting viewpoints. Throughout this EIS process, we will fairly and objectively weigh the good and bad points of each alternative course of action, to make the best decision.

Earlier, we identified seven broad issues from public comments and presented these issues in "Request for Participation #2." While refining these issues, the interdisciplinary team gathered information and identified analysis needs. The following discussion highlights the background of the issues and the analysis that is planned or underway.

THE HUMAN HEALTH ISSUE

Health issues related to managing vegetation have been a major focus for many years. Safety of herbicides is the most controversial part of the human health issue. The effects of smoke from prescribed burning has also emerged as an important issue.

With consultation and support from representatives of the environmental and business community, we are using both a qualitative and quantitative approach to assess human health risks. The University of Washington is assisting us with developing the **qualitative** assessment.

We are studying information, characterized in **quantitative** risk assessments, such as the "Supplement to the Western Oregon Program —Management of Competing Vegetation, February 1986" developed under joint contract with the Bureau of Land Management. Information contained in risk assessments conducted by other agencies such as the "Worst Case Analysis Study on Forest Plantation Herbicide Use, May 1986" (Washington Department of Natural Resources) will also be considered.

We have recognized that in the area of human health, what we don't know is often as important as what we do know. We plan to very carefully consider and disclose the relative certainty of information, and to identify missing information.

THE PUBLIC PARTICIPATION ISSUE

People have concerns related to our vegetation management programs; but more than concerns, many feel they have something positive to contribute. We are committed to giving people that opportunity for contributions—both in the development of the Regional program and in subsequent projects on Forests.

We are working closely with representatives from the environmental and business communities as well as our employees. Many good ideas are emerging and we are incorporating them in the development and analysis of alternatives.

Since June of 1986, members of the public have been involved through direct mailings, networks in the environmental, business, and Forest Service communities, two issues workshops, and various meetings. Over 370 people, including Forest Service employees, have given us written comments.

Two "working groups," one representing the interests of the business community and the other the environmental community, are working closely with the interdisciplinary team. Their respective values and perspectives are being considered in the development of the EIS. The Northwest Coalition for Alternatives to Pesticides (NCAP) and Oregonians for Food and Shelter (OFS) have taken leadership roles in setting up these working groups.

Other organizations have expressed interest in making contributions to the development of the EIS. They include the Society of American Foresters, The Nature Conservancy, Washington Forest Protection Association, Oregon Environmental Council, Chambers of Commerce, citizen task forces, other forest protection associations, and conservation committees.

We will continue to seek public involvement through Requests for Participation, working groups, contacts with cooperating agencies, and by actively listening to what you are telling us.

THE SOCIAL AND ECONOMIC EFFECTS ISSUE

Many people expressed concern about the economic effects of various ways of managing vegetation. Others stated that employment effects must be considered along with the quality of community life.

The different alternatives will display effects on the environment, the supply of timber, forage, and other goods and services. The economic analysis of the alternatives will be based on these effects. This will enable us to display the different impacts of the alternatives on employment levels, the payments to local governments, and any changes in the structure of employment or the economy.

Changes to the environment, the economy, and to people's expectations all affect the quality and stability of community life. These social effects will be analyzed and displayed for all the alternatives in the EIS.

THE COST/BENEFIT ANALYSIS ISSUE

A great many people expressed concern that their money and their resources (in the form of the National Forests) be wisely managed, and put to the most beneficial uses.

To that end, each of the Region's 19 Forests are assisting the interdisciplinary team. They are providing information and estimates about tradeoffs in vegetation management activities, related costs, and potential environmental effects that would occur on each Forest under each of the proposed alternatives. The information will be part of the analytical base used to provide an overall estimate of the costs and benefits associated with each alternative.

As part of our analysis we will analyze the relationships (or trade-offs) of resource supply and costs, activities and environmental effects.

THE ENVIRONMENTAL EFFECTS ISSUE

Almost everyone who has responded in any way to the development of the EIS has expressed concern and interest in the quality of the human environment—both biological and physical.

Analysis of environmental effects requires team specialists to gather current and relevant literature, contact scientists and other experts in their specialty, and coordinate with other agencies. We are beginning to design ways to best analyze effects on individual resources and the interrelationships between them. For example, to analyze the effects of alternatives on air quality, each forest is estimating smoke emissions from future prescribed fire programs. These estimates are being derived from the amount of logging slash burned, the number of acres, burned and the seasonal timing of the burns.

Direct, indirect, cumulative and synergistic effects will be considered when analyzing components of the environment. Cost and benefit information provided by all the Forests will also be used in evaluating environmental effects.

THE EFFECTIVENESS OF TECHNIQUES ISSUE

Many of you have told us we need to fit appropriate vegetation management techniques to specific site conditions. We also recognize the need to seek a balance between how effective a method is and how much it costs.

This EIS will include a comprehensive "methods" section. It will discuss five methods in detail: chemical, mechanical, biological, thermal, and manual. Characteristics of methods will be described along with where they are found to be most effective. In addition, a comparison of the sixteen different chemical herbicides (with completed risk assessments) will be part of this discussion.

The EIS is being used as a tool to share what we have learned with others. It also looks ahead, and will discuss processes for considering new technologies and products as they are developed.

THE INTERAGENCY COORDINATION ISSUE

Many agencies have responsibilities for vegetation management that overlap our responsibilities. We are working closely with many agencies in responding to issues for both the development of alternatives and conduct of analysis. Ten agencies have been formally designated as cooperators by the Regional Forester. They are:

- Oregon and Washington Departments of Transportation
- Oregon and Washington Departments of Agriculture
- Oregon Department of Environmental Quality
- Washington Department of Ecology—(pending)
- Washington Department of Natural Resources —Division of Forest Lands
- Environmental Protection Agency—Seattle
- University of Washington
- Oregon State University Extension Service (pending)

Many other agencies have expressed their interest in reviewing and commenting on our work. They include:

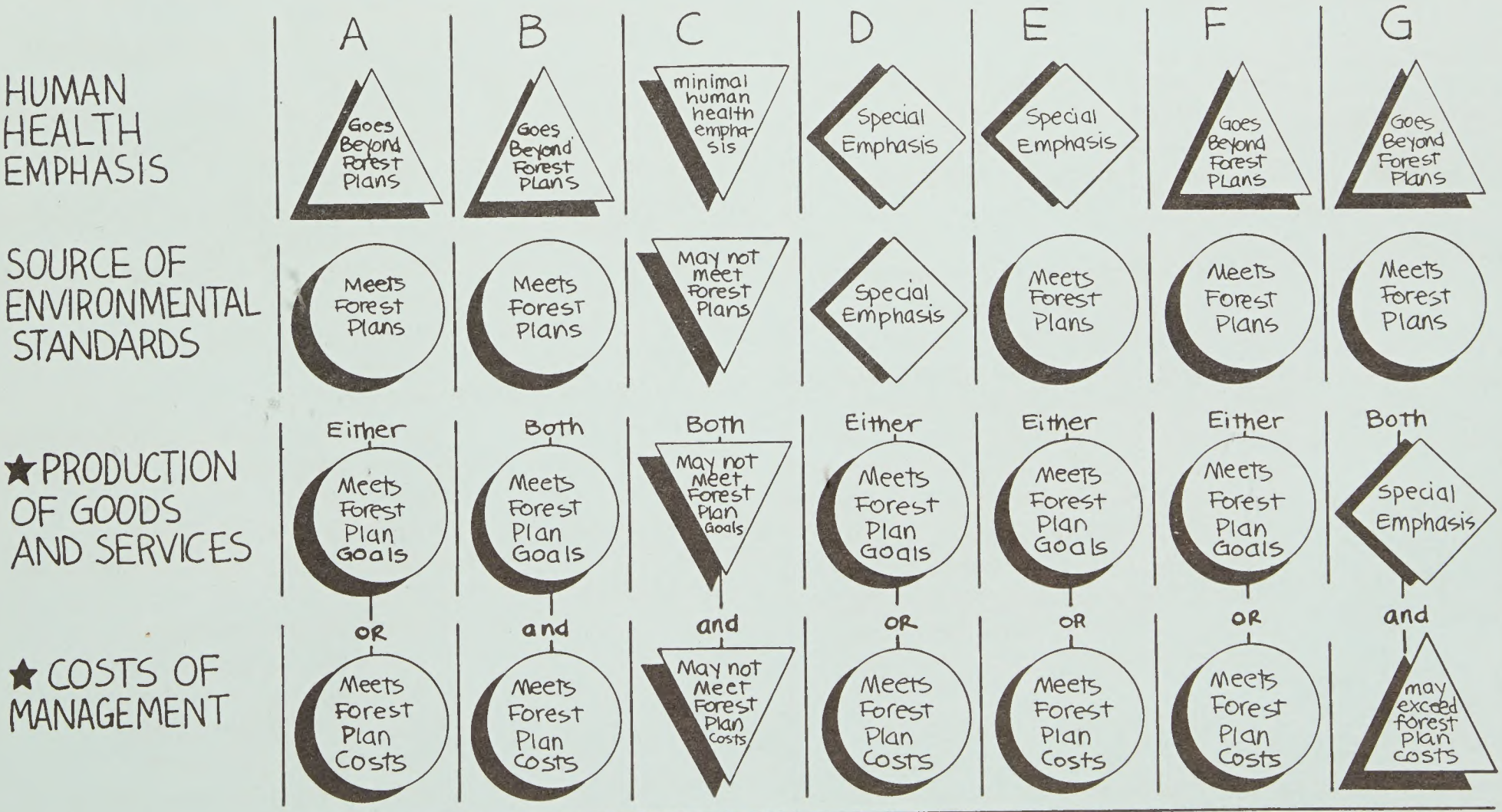
- Bonneville Power Administration
- Oregon and Washington Departments of Health
- Oregon Department of Forestry
- Federal Highway Administration
- Washington State Association of Counties
- Association of Oregon Counties
- County Weed Control Boards
- Soil and Water Conservation Districts

DESCRIPTION OF ALTERNATIVES FOR MANAGING UNWANTED VEGETATION

FOCUS OF ALTERNATIVE	A Implement forest plans without herbicides	B Implement forest plans	C No vegetation management	D Implement forest plans using preventative measures and natural ecosystem processes	E Implement forest plans with lowest risk to health and safety	F Implement forest plans; reduced use of prescribed fire	G Intensively manage vegetation to exceed forest plan projections
WHAT ACTION DO WE TAKE?	Most appropriate to prevent or correct damage or risk	Most appropriate to prevent or correct damage or risk	Correction; only when public health and safety are clearly threatened	Prevention preferred, correction only when prevention fails	Prevention preferred; correction if lower in cost or impact	Most appropriate to prevent or correct damage or risk	Intensively use most appropriate to prevent or correct any damage or risk
WHAT TOOLS DO WE HAVE TO USE?	All tools, except herbicides	All tools	All tools, except burning and herbicides	All tools with chemicals used as a last resort	All tools with specific restrictions based on risk to health and safety	All tools, minimal slash burning	All tools

RELATIONSHIP TO FOREST PLANS

△ Goes beyond forest plans
◇ Forest plans with special emphasis
○ Meets forest plans
▽ May not meet forest plans



★FOR FOUR OF THE ALTERNATIVES, A, D, E, AND F, WE WILL BE CONDUCTING ANALYSIS TO DETERMINE THE RELATIONSHIP BETWEEN COSTS AND THE PRODUCTION OF GOODS AND SERVICES